

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

AGSPRING, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10699 (CTG)

Jointly Administered

**Re: Docket No. 55**

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' MOTION FOR ENTRY  
OF ORDER (1) APPROVING STIPULATION AUTHORIZING USE OF CASH  
COLLATERAL, (2) GRANTING ADEQUATE PROTECTION, (3) MODIFYING  
THE AUTOMATIC STAY AND (4) GRANTING RELATED RELIEF**

The undersigned hereby certifies that:

1. On July 28, 2023, the above-captioned debtors and debtors in possession (the "Debtors") filed the *Debtors' Motion for Entry of Order (1) Approving Stipulation Authorizing Use of Cash Collateral, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay and (4) Granting Related Relief* [Docket No. 55] (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

2. Pursuant to the notice of the Motion, responses were due to be filed on, or prior to, August 11, 2023 at 4:00 p.m. (ET) (the "Objection Deadline"). The Objection Deadline was extended to August 16, 2023 for the Office of the United States Trustee (the "UST"). The Debtors received informal comments to the Motion from the UST and NGP X US Holdings ("NGP").

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Agspring, LLC (7735); Agspring Idaho 1 LLC (1720); Agspring Idaho LLC (8754); FO-ND LLC, dba Firebrand Artisan Mills (1520); Agspring Logistics LLC, dba Agforce (6067); and Agspring Idaho 2 LLC (9262). The Debtors' mailing address is 5101 College Boulevard, Leawood, KS 66211.

3. The undersigned certifies that the Bankruptcy Court's docket has been reviewed in this case and no answer, objection or other responsive pleading to the Motion appears thereon.

4. A revised form of order (the "Proposed Order") and amended stipulation authorizing the Debtors' use of Cash Collateral (the "Amended Stipulation," attached to the Proposed Order as **Exhibit 1**) resolving the UST's and NGP's comments is attached hereto as **Exhibit A**. A blackline comparison of the Proposed Order against the form of order filed with the Motion and a blackline comparison of the Amended Stipulation against the version filed with the Motion is attached hereto as **Exhibit B**. The UST does not object to entry of the Proposed Order. NGP and the Debtors' prepetition lenders consent to entry of the Proposed Order.

5. Accordingly, the Debtors respectfully request entry of the Proposed Order at the Bankruptcy Court's convenience.

Dated: August 17, 2023

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Laura Davis Jones

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*Proposed Counsel for Debtors and Debtors in Possession*